

83 Clerkenwell Road

Planning Statement

Firstplan Ref: 19398

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Section 1 Introduction

- 1.1 This planning statement has been prepared by Firstplan, on behalf of Dorset County Pension Fund c/o CBREGI, in respect of proposals at 83 Clerkenwell Road for:

“Construction of rear extension to office building. External alterations including new entrance on Hatton Garden elevation, alterations to plinths below existing railings, staircase to front lightwell, dropping cills of windows and alteration to door at lower ground floor, louvres to existing rear extension, construction of roof terrace and associated access, installation of roof plant with enclosure.”

- 1.2 83 Clerkenwell Road is located within the Hatton Garden Conservation Area and is identified as a building that makes a positive contribution to the area. It originally comprised a series of Victorian buildings constructed in the late 19th Century. In c.2002 the buildings were significantly altered with the addition of a rear extension to new pitched roof with dormer windows.
- 1.3 The application follows a recent approval for external alterations, plant and roof terrace (2020/2795/P). It is now additionally proposed to construct a rear extension including additional terraced areas and to make some alterations to the lower the existing plinths to the front railings. It is also proposed that the roof terrace will be allowed to be used until 8pm Monday-Friday and that small louvres are installed on the rear elevation of the existing rear extension.
- 1.4 The rear extension has been subject to pre-application advice and the design has been amended in response to this.
- 1.5 The creation of additional office floorspace will optimise the use of the site, in accordance with planning policy. The roof terraces will benefit the wellbeing of the office workers by creating two outside spaces in this highly urban environment.
- 1.6 The proposed rear extension has been designed to complement the existing buildings through the use of traditional materials. It will be subservient to the existing building and is not considered to harm the heritage assets.

- 1.7 The proposals have been designed to take into account neighbouring residential properties to ensure that their residential amenity is not adversely impacted on. In this respect a daylight and sunlight report is submitted in support of the application.
- 1.8 Section 2 sets out background information. Section 3 sets out a scheme description. The planning policy context is set out at Section 4. Section 5 sets out consideration of the key planning issues. Section 6 provides the conclusions.

Section 2 Background Information

a) Description of the Application Site and Surroundings

- 2.1 The application site comprises a series of three storey Victorian buildings with basement and roof accommodation which are located at the junction of Clerkenwell Road and Hatton Garden.
- 2.2 The building fronting Clerkenwell Road is constructed of red brick with red brick detailing. It has a porched entrance door at ground floor level and a prominent gable end. There are railings to the front that surround a lightwell.
- 2.3 The adjoining buildings on Hatton Garden (58A, 58B and 58C) are constructed of stock brick with a variety of detailing. This includes a warehouse building with large sash windows and decorative banding with two plainer buildings either side, one with red brick bands.
- 2.4 Internally, the buildings have been amalgamated and are occupied as one office development.
- 2.5 Adjacent to the site in Clerkenwell Road is a six storey office building which dates from 19th century and is also noted within the conservation area appraisal as making a positive contribution.
- 2.6 To the rear of the site is Black Bull Yard, a contemporary mixed-use development comprising offices with residential development on the upper floors.
- 2.7 Photographs of the site are provided within Design and Access Statement by GPAD Architects.

b) Planning History

i) The Site

- 2.8 An application for external alterations including new entrance on Hatton Garden elevation, staircase to front lightwell, dropping cills of windows and alteration to door at lower ground floor, construction of roof terrace and associated access, installation of roof plant with enclosure was approved in October 2020 (2020/2795/P).

- 2.9 An application for the refurbishment and alteration of the existing office building, involving a new stair to rear of 83 Clerkenwell Road, additional extension to the rear, the erection of a roof extension and the installation of new plant at roof level was approved in February 2002 (ref; PSX0005408). The consent was subject to a S106 agreement concerning a green travel plan, a servicing management plan and an environmental improvement contribution.
- 2.10 Planning permission for installation of two air condenser units at roof level at rear of existing office building (class B1), and small extract louvres at rear ground level was granted in 2005 (2005/3398/P).
- 2.11 The application follows pre-application advice with a planning and a conservation officer. The proposals have been amended following this advice (ref: 2020/1496/PRE). This includes revising the fenestration detailing to the rear extension.

ii) The Surrounding Area

- 2.12 Planning permission was granted in September 2015 at 18-26 Hatton Wall for redevelopment comprising retention of the building and replacement of western, northern and eastern facades, a three-storey roof extension, and single-storey extension to eastern elevation to provide a mixed-use building comprising offices (B1a), jewellery workshops (B1c) and 7 self-contained residential flats (C3) (2014/5873/P). This development is known as Black Bull Yard and was also completed by GPAD Architects.
- 2.13 Planning permission was granted in 2017 at 14 Hatton Wall for change of use of part ground floor, first, and second floors from commercial (Class B1) to provide one residential maisonette (Class C3), erection of single storey roof extension, installation of roof terraces on 3rd floor and main roof, and alterations to front and rear elevations (2017/5910/P).

Section 3 Scheme Description

- 3.1 This application proposes construction of rear extension to office building. External alterations including new entrance on Hatton Garden elevation, staircase to front lightwell, dropping cills of windows and alteration to door at lower ground floor, louvres to existing rear extension, construction of roof terraces and associated access, installation of roof plant with enclosure.
- 3.2 The rear extension will be part four storey, part three storey and part single storey. It will be constructed of brick to match the existing building with red brick detailing above the windows. The extension, together with the access to the roof terrace, will provide an additional 195sqm of office floorspace (GIA).
- 3.3 The main roof terrace will comprise 58sqm and will be surrounded by a metal balustrade measuring 1.2 metres high. The existing stair core will be extended to allow access to roof level and a platform lift will be provided. A smaller roof terrace will be provided at third floor level, also enclosed by a metal balustrade. It is proposed that the hours the two terraces can be used be restricted to 9.00 – 20.00 Monday – Friday. This is slightly later than the previous approval and is required to give office tenants sufficient flexibility as they are likely to work later than 5pm. Justification for these additional hours is set out in Paragraph 5.12 of this report.
- 3.4 The proposed rooftop plant will replace existing mechanical plant which has become outdated. The new plant will be more energy efficient and has been well set back from the street to minimise the visual impact.
- 3.5 The entrance into the office is the same as previously approved. The proposals enhance the building by providing new glazing and a bronze coloured surround to the main access steps and a replacement platform lift. As with the previous approval, the remaining existing doors at ground floor level will also be replaced within the existing openings, including reopening one of the blocked up entrances on the Hatton Garden elevation.
- 3.6 A cycle store will be provided at basement level, via a new staircase within the lightwell. This staircase will have a bicycle ramp on it and has been laid out to ensure easy manoeuvrability of bicycles.
- 3.7 The openings within the front lightwells will be enlarged to increase natural light to this level.

- 3.8 It is proposed to make some alterations to the plinths of the existing front railings on the Hatton Garden elevation to increase natural light into the basement. This will be achieved by lowering the existing low brick walls and remounting the existing railings. A graduation in height will be retained on front of the different properties.
- 3.9 Further details of the proposed scheme are set out in the Design and Access Statement by GPAD Architects.

Section 4 Planning Policy Context

4.1 The statutory development plan relevant to the application site consists of the Camden Local Plan (2017) and the London Plan (2016 with revised alterations). The NPPF (2019), the Camden Planning Guidance and the Hatton Garden Conservation Area Appraisal and Management Strategy (2017) are also material considerations.

4.2 It is noted that the New London Plan may be adopted by the time an application is determined.

4.3 The site has the following designations:

- Hatton Garden Area
- Central London Area
- Hatton Gardens Conservation Area
- Viewing Corridor
- Archaeological Priority Area

a) **National Planning Policy Framework (NPPF) (2019)**

4.4 The NPPF provides overarching planning policy guidance for development across England. It states that:

“the purpose of the planning system is to contribute to the achievement of sustainable development” by “meeting the needs of the present without comprising the ability of future generations to meet their own needs”.

4.5 Paragraph 80 details the importance that the government places on promoting economic development and explains that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

4.6 Section 12 is concerned with achieving well-design places. Paragraph 124 sets out that good design is a key aspect of sustainable development, which in turn, creates better places in which to live, work and helps make development acceptable to communities.

4.7 Section 16 sets out guidance in relation to conserving and enhancing the historic environment. Paragraph 185 sets out that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

4.8 Paragraph 193 outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. The designated heritage asset in this case is the Hatton Garden Conservation Area.

b) London Plan (2016)

4.9 The London Plan provides the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of the capital.

4.10 In terms of design, Policy 7.2 explains that all new development in London to achieve the highest standards of accessible and inclusive design. Policy 7.4 sets out that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

4.11 Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

c) Draft New London Plan (Intend to Publish Version 2019)

4.12 The London Plan (2016) is still the adopted Development Plan, but the Draft New London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision

maker, but it gains more weight as it moves through the process to adoption. The following draft New London Plan policies are of relevance.

- 4.13 Draft Policy D1 'London's Form and Characteristics' highlights that development should seek to positively respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality. Additionally, development should respect, enhance and utilise the heritage assets and architectural features that make up local character.
- 4.14 Draft Policy HC1 'Heritage Conservation and Growth' sets out that development proposals which affect heritage assets, and their wider settings, should conserve significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should seek to avoid any negligible impact and identify enhancement opportunities by integrating heritage considerations at an early stage within the design process.

d) Camden Local Plan (2017)

- 4.15 Within the Local Plan, Policy G1 sets out that Camden will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 4.16 Design requirements are set out in Policy D1, highlighting the need for high quality development that responds positively to the local area, specifically referencing high quality design in alterations and extensions.
- 4.17 Policy D2 relates to heritage and the need to protect the historic environment. It requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- 4.18 Economic development in the borough is considered in Policy E1 which highlights that support will be given for businesses of all sizes and seeks to create conditions for economic growth. Policy E2 further expands on this, stating that the Council will encourage the provision of employment premises and sites in the borough.
- 4.19 Policy C6 explains that the Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. This includes expecting all buildings and places to

meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

- 4.20 Policy A1 requires applications to protect the quality of life for occupiers and neighbours and sets out that the Council will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities.
- 4.21 Policy A4 relates specifically to noise and vibration and confirms that permission will not be granted for development likely to generate unacceptable noise and vibration impacts. Permission will only be granted for plant and machinery where it can be operated without causing harm to amenity
- 4.22 Policies CC1 and CC2 concern sustainability. Policy CC1 sets out that all developments need to meet the highest possible environmental standards, but Policy CC2 sets out that Sustainability Statements are only required for development for 5 or more residential units or over 500sqm additional floorspace.
- 4.23 Policies T1 and T2 relate to prioritising sustainable transport in the borough.

e) Supplementary Planning Guidance

- 4.24 The Council has several supplementary planning documents which are relevant. This includes: Design CPG (2019), Amenity CPG (2018), Transport CPG (2019) and Energy Efficiency and Adaptation CPG (2019).

Section 5 Key Planning Issues

5.1 This section of the statement considers the proposed replacement dwelling against the relevant national and local planning policy context. The key planning considerations arising from the proposal are:

- The principle of the development
- Design and heritage
- The amenity of surrounding occupiers
- Energy and sustainability
- Highways, parking and access.

5.2 These are discussed below, along with any other matters considered relevant to the application.

a) Principle of the Development

5.3 The proposals seek to enhance the existing office provision by providing an extension which increases the floorspace by 195 sq.m. (GIA). This is in accordance with the aims of the NPPF and local planning policies E1 and E2.

b) Design and Heritage

5.4 The design rationale for the development is set out in the submitted Design and Access Statement by GPAD Architects. A Heritage Statement is provided by the Heritage Practice.

5.5 In summary, the proposed rear extension is located to the rear and will not be visible from the street. It has been designed to complement the existing rear elevation, which has partially already been extended as part of the 2002 consent.

5.6 The louvres are required for increased ventilation to the office floorspace. They are discretely located to the rear within the extensions to the building.

5.7 The changes to the plinths to the front railings will increase natural light to the basement. The existing railings will be retained but the low brick walls will be reduced in height. A graduated change in heights will continue to be provided to maintain the rhythm of the frontage.

5.8 All of the other proposed alterations such as the plant, entrance and cycle store staircase have been permitted as part of the recent consent.

c) Impact on Residential Amenities

5.9 The closest residential properties to the site are at 14 and 16 Hatton Wall, Black Bull Court and at the fourth and fifth floor levels of Black Bull Yard.

5.10 Local Plan Policy A1 seeks to ensure that the amenity of communities, occupiers and neighbours is protected. This includes visual privacy, outlook, sunlight, daylight and overshadowing, transport impacts, noise and vibration levels.

5.11 The application is supported by a daylight and sunlight report by Lumina London Limited which shows that the proposed development will not result in any material loss of daylight or sunlight received by existing neighbouring residential premises so as to have an unreasonable effect on amenity.

5.12 With regard to the potential for overlooking, there are no windows proposed which directly look towards residential properties. This was considered acceptable at the pre-application stage.

5.13 With regard to the potential for overlooking from the roof terraces, the submitted proposed Section shows the relationship between the terrace at the flats on the upper floors of Black Bull Yard. The flats are located at a higher level than the roof terraces and owing to the orientation of the terrace and the location of the flats' windows the terrace is not considered to cause material harm. The first floor flat roof will not be accessible apart from for maintenance.

5.14 In order to further protect the amenity of neighbouring occupiers, it is proposed that the use of the roof terrace is restricted to the hours of 9am – 8pm Monday - Friday. This is consistent with the following decisions by Camden:

- Under application ref. 2020/1397/P permission was granted for the creation of a '5th floor terrace with glass balustrade to replace existing maintenance walkway to the front elevation of building' at 26-28 Bedford Row WC1R 4HE, on 2 June 2020. A condition was placed on the decision limiting the hours of use of the roof terrace from 08:00 to 20:00 Monday to Saturday and not at all on Sundays

disturbance, a condition is recommended to be added to ensure that the roof terrace is only used between 08:00 and 20:00 to protect the amenity of the surrounding occupiers and street."

- Under application ref. 2019/6395/P permission was granted for alterations to the office building including provision of external amenity area, with replacement of plant at 2nd floor terrace to rear at 43 Eagle Street London WC1R 4AT on 28 May 2020. A condition was attached which limited the use of the outdoor terrace area between 09:00 and 19:00 Monday to Friday.
- Under application ref. 2019/2231/P permission was granted for the installation of a glazed balustrade to the flat roof for use as external terrace space to existing office at 26 Red Lion Square WC1R 4HQ on 28 June 2019. No condition was attached limiting the hours of use of the terrace.
- Under application ref. 2018/3874/P permission was granted for the erection of a fifth floor rear roof extension incorporating new roof terrace relating to the existing offices at 193-197 High Holborn WC1V 7BD on 5 June 2019. A condition was attached limiting hours of operation of the terrace to between 09:00 and 20:00 Monday to Friday.
- Under application ref. 2018/1578/P permission was granted for the erection of third floor level roof extension for B1 office use and creation of a front facing roof terrace at third floor level at 6 Hatton Place , EC1N 8RU on 23 April 2018. No condition was placed on the hours of use of the terrace.

- 5.15 The proposed hours are slightly later than the approved consent for the roof terrace and are required to enable flexibility of office workers working slightly longer hours on occasions. In the context of the above consent the proposed hours should be considered acceptable.

d) Energy and Sustainability

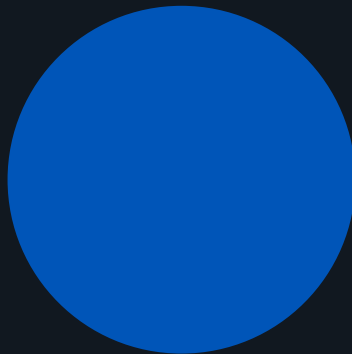
- 5.16 The existing building has mechanical ventilation, with two condenser units approved in 2005 and an array of other plant located at roof level.
- 5.17 The proposed replacement plant will be significantly more energy efficient than the existing plant. The application is supported by an Energy Strategy by Quinn Ross which concludes that when including all available Lean, Clean and Green technologies and methods, the development will achieve a 53% improvement over London Plan requirements. Highly efficient heat pumps for heating and cooling are specified, and mech vent units with low SFPs and heat recovery. Furthermore, LED lighting will be installed throughout and all pipework will be insulated. Although not a policy requirement, it should be noted that the applicant is targeting for the building to achieve BREEAM Excellent. The proposals should therefore be considered to accord with the aims of Policies CC1 and CC2

e) Highways, parking and access

- 5.18 The office will remain car free which is appropriate given its location.
- 5.19 The application proposals include a cycle store at basement level which will accommodate 38 spaces. This is well above the provision required by the London Plan for a building of this size. The proposals therefore accord with local planning policies T1 and T2.

Section 6 Conclusions

- 6.1 This Planning Statement has been prepared by Firstplan in support of a planning application for erection of a rear extension, external alterations including new entrance on Hatton Garden elevation, staircase to front lightwell, dropping cills of windows and alteration to door at lower ground floor, louvres to existing rear extension, construction of roof terrace and associated access, installation of roof plant with enclosure.
- 6.2 The application follows a recent approval for external alterations, plant and roof terrace (2020/2795/P). It is now additionally proposed to construct a rear extension including additional terraced areas and to allow use of the terraces 9am – 8pm Monday-Friday.
- 6.3 The application seeks to add to the offer of the building as high-quality office accommodation, whilst ensuring that the proposals maintain and enhance the character of the building and its conservation area setting. The increase in office floorspace in this location is actively encouraged by policy at all levels.
- 6.4 The rear extension is small scale and has been designed to complement the existing buildings and the wider conservation area including the use of red brick window headers.
- 6.5 The roof proposals have been set well back from the street to minimise their visual impact. The proposed alterations to the entrance and cycle store have previously been approved and have considered the existing buildings proportions.
- 6.6 The existing building has mechanical ventilation. The proposed replacement plant will be highly energy efficient and an energy strategy has been submitted in support of the application. The wider project is targeting to refurbish the building to achieve BREEAM Excellent. The proposals are therefore in accordance with the Council's sustainability policies.
- 6.7 The proposals have been designed to ensure that there is no adverse impact on the residential amenity of surrounding occupiers and the application is supported by a daylight and sunlight report.
- 6.8 In light of the above, the application proposal should be considered acceptable in all respects, and we therefore respectfully request that consent is granted.



Firstplan Ltd
Broadwall House
21 Broadwall
London, SE1 9PL

T: 020 3096 7000
www.firstplan.co.uk